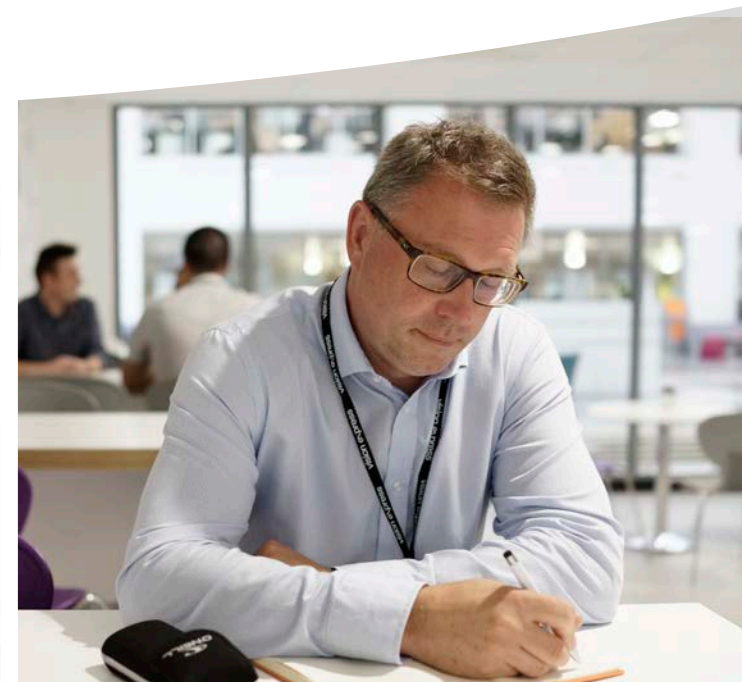


Modern Slavery Statement

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Introduction

Vision Express recognises its responsibility and is committed to addressing and preventing the risk of modern slavery in the organisation and supply chains. This statement sets out how we comply with the Modern Slavery Act and continue to embed anti-slavery activity within our standard practice.



Organisational Structure, Business and Supply Chain

Vision Express is one of the largest optical retailers in the UK with almost 600 stores nationwide. With around 6,000 employees, Vision Express makes a significant difference to the communities it operates within, and the organisations it chooses to support. Vision Express is a part of GrandVision NV, a global leader in optical retail with over 7,000 stores in over 40 countries in Europe, the Americas and Asia.

The GrandVision group of companies are committed to delivering high quality and affordable eye care to more and more people around the world, through our wide range of expert vision services and unique assortment of prescription glasses, contact lenses and sunglasses, both with and without prescription lenses. In the UK, the Vision Express group delivers this service to customers with a 'Vision. Taken Seriously.' message.

Vision Express in the UK is part of GrandVision's supply chain operating model. Under this operating model, Vision Express and the joint-venture and franchise companies operate retail businesses focused on selecting the best product assortment for the UK consumer and presenting and managing this assortment to maximise customer satisfaction. For its part, GrandVision, through its subsidiary GrandVision Supply Chain BV, provides a centralised supply function for goods for resale and is responsible for:

- Purchasing goods
- New supplier approval
- Managing supplier relationships

The Vision Express Executive and Leadership team work closely with GrandVision on compliance activities relating to Modern Slavery and Human Trafficking.



Organisational Policies

The GrandVision and Vision Express group of companies are committed to ensuring that they act ethically and with integrity in our business relationships. GrandVision sets out clear policies that must be complied with by each business, across all countries they operate.

- **GrandVision internal Code of Conduct** Available on the [GrandVision website](#). All employees are required to abide by the code of conduct, which is communicated through during an employee's induction to the organisation. The policy is included in the employee handbook and supported by a compulsory training module.
- **GrandVision Supplier Code of Conduct** Available on the [GrandVision website](#).
- **GrandVision Global Human Rights Policy**
- **GrandVision Responsible Sourcing Policy**

Vision Express Policies

Vision Express policies support the values and commitments made by GrandVision. The following policies work collectively to assess, prevent and mitigate the risk of modern slavery. All policies are developed and reviewed by a Policy Steer Group and widely communicated internally and to relevant external stakeholders.

- **Vision Express Modern Slavery Policy**
We have a zero-tolerance approach to modern slavery; this policy highlights the responsibility of those working for the organisation to prevent, detect and report such violations.
- **Vision Express Whistleblowing Policy**
Should employees have any concerns in relation to modern slavery, they may raise the issue in confidence by contacting our whistleblowing hotline or by email.
- **Vision Express Remuneration Policy**
This policy ensures the fair and equitable treatment of all employees and is committed to the principle of equal pay in employment.
- **Vision Express Recruitment Policy & Young Workers Policy**
These policies ensure a fair and transparent recruitment process, and where necessary, the use of recruitment agencies should be utilised in line with an approved supplier list, provided by the Recruitment Department.
- **Safeguarding Policy & Committee**
This policy and committee are dedicated to safeguarding and promoting the welfare of all as employees, with particular focus on young workers and apprentices.

Assessing and Managing Risk

The risks arising in relation to Modern Slavery and Human Trafficking are managed by Vision Express and GrandVision in accordance with the group's approach to business-wide Risk Management, as set out in the [Annual Report](#).

The following areas have been identified as carrying the highest potential risk of slavery and human trafficking taking place in the GrandVision group:

- Labour Conditions in Product Supply Chain
- To mitigate this risk, a Compliance Framework is in place that sets out policies, reporting, e-learning, training requirements and localization guidelines.
- GrandVision operates regular audits of its suppliers in order to ensure compliance with the GrandVision Supplier Code of Conduct, which complies with international labour standards, human rights and environmental standards.

“

We use GrandVision's Supplier Code of Conduct to clearly communicate our expectations and assess supplier performance through a variety of measures. We also look to work with suppliers to reduce any negative impacts on people and society. The policy includes mandatory requirements on the observation of human and labor rights in business relationships with GrandVision, as set out in our Code of Conduct. GrandVision ensures all suppliers receive and acknowledge a copy of the Policy, and clearly communicates the importance of ethical business conduct. We verify alignment to the Supplier Code of Conduct and Social Compliance Standards through regular third-party audits, using a certified grading system. All employees engaged in procurement and with suppliers also have responsibility and accountability for compliance with this policy.” GrandVision Annual Report, 2018

The following areas have been identified as carrying the highest potential risk of slavery and human trafficking taking place in the Vision Express group of companies:

- **Migrant / Agency labour in our stores and the Vision Express Tech Centre**
All our employees are paid above the national minimum wage and full eligibility to work checks are completed prior to employment, (supported by our Recruitment Policy). Our teams are trained to report any concerns in relation to safeguarding either relating to internal or external concerns. There is a central payroll function which provides transparency over the payment of employees.
- **Third Party Agency Labour**
Our Store Support Centre, joint venture companies and franchisees work locally with several third-party employment agencies and employment businesses under formal agreements.

Due Diligence Process

GrandVision ensures that all suppliers receive and acknowledge a copy of our **Responsible Sourcing Policy**. We verify compliance of the suppliers with the GrandVision **Supplier Code of Conduct** through the use of regular third-party audits. All employees engaged in procurement and with suppliers also have responsibility and accountability for compliance with the GrandVision Supplier Code of Conduct.

“Employees acting in contravention of the commitments set forth in this Code of Conduct may encounter disciplinary measures, ranging from a warning, coaching, training, written reprimand, deduction of salary, or transfer up to suspension or dismissal/termination of contract. In addition, bribery and corruption violations may lead to substantial fines and imprisonment.” **GrandVision, Code of Conduct**

Sourcing our Suppliers Responsibly

As a trustworthy partner we are committed to ensuring we deal with suppliers that also recognise their responsibility to the people they employ and the communities they affect. GrandVision looks at its entire value chain for opportunities to foster economic stability among its suppliers.

We are committed to business practices that do not infringe on human rights and that are aligned to the various international standards for responsible business conduct, including the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on the Fundamental Principles and Rights at Work.

Through our Supplier Code of Conduct, we clearly communicate our expectations in these areas and assess supplier performance. We then work with suppliers to ensure that any issues are continuously addressed.

The GrandVision Supplier Code of Conduct provides the following key principles:

- Suppliers will permit GrandVision Group or its appointed representatives to access and audit the plants where the products or parts are manufactured, in order to investigate the proper accomplishment of the obligations provided for in this agreement and in the relevant contracts.
- Upon prior arrangement with the Supplier, the GrandVision Group will have the right to carry out, either itself or through an agent, quality as well as Code of Conduct audits in the Supplier’s business premises.

Performance Indicators

We will measure the effectiveness of the steps we are taking by tracking:

- Incidents reported by our employees (whistleblowing or otherwise), the public or law enforcement agencies. We did not have any reported incidents in 2017/18.
- Satisfactory receipt and assessment of information received from suppliers
- Regular review of staff training and how many staff complete relevant e-learning modules. All new starters of Vision Express are expected to complete the Code of Conduct e-learning module within the first 4 weeks of employment, and then annually. In 2018, a new process was implemented to monitor and report the compliance of e-learning, and is communicated into a weekly report for Division Directors.

Training

As part of our commitment to compliance and understanding, our employees are required to complete the GrandVision Code of Conduct training annually. This is tailored depending on the role the individual holds and their likely exposure to certain risk situations.

The policy is highlighted in induction training and in the employee handbook given to new employees.

Our Progress

We requested Slavery and Human Trafficking statements from our local suppliers which we have now received. We communicate our minimum labour standards and the consequences if the compliance is not as we expect, with all suppliers.

Business Risk Review Process – Internal compliance against our standards for Modern Slavery and Ethical Business Conduct is regularly reviewed as a key part of our quarterly business risk review undertaken by the executive management.

Recruitment Agency review and contract update. We have reviewed our agency relationships and all have stringent contracts in place and adhere to clear and robust compliance standards.

We commit to reviewing this statement each year.

Nick Coton
Chief Financial Officer

June 2019



Vision. Taken seriously.

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